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July 16, 2001

Kim Ogle, RCRA Project Manager
United States EPA, Region 10
1200 Sixth Avenue
Seattle, WA 98101

**Re: July 15, 2001 Progress Report
J. H. Baxter Arlington Facility
Docket No. RCRA-10-2001-0086
7026-04**

Dear Ms. Ogle:

This letter provides the July 2001 progress report for work completed under the Administrative Order on Consent (AOC) for the J. H. Baxter facility during the period June 16, 2001, and July 15, 2001.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses the significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the Order. Significant developments that occurred on this project are outlined below:

- We revised the Drinking Water Sampling and Alternate Water Supply Work Plan per EPA comments of June 4, 2001, and discussions held in a teleconference on June 8, 2001. The revised Work Plan was submitted on June 18, 2001, two weeks following the date of EPA's comment letter.
- We completed the well inventory during this period and met with EPA on June 22, 2001, to discuss the inventory findings. We then conducted the initial sampling of 21 wells located within the AOC boundary on June 26, and 27, 2001. A summary of the inventory process, findings, and the sampling procedures is presented in a Memorandum Re: Drinking Water Well Inventory and Initial Sampling, enclosed with this progress report.

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- On July 2, 2001, we submitted a letter to Dean Yasuda with the Washington State Department of Ecology (Ecology) requesting a contained-in determination for the stormwater that is treated as part of the excess stormwater management plan.
- On July 7, 2001 we met with Kirk Cook with Ecology's Water Quality and UIC programs. Mr. Cook indicated that with the contained-in determination, and given that the stormwater will meet the 1 ppb drinking water standard, the UIC program will be able to permit the proposed subsurface infiltration system.
- On July 5, 2001 we received Draft comments from EPA on the Excess Stormwater Management Work Plan and discussed those comments in a teleconference held on July 12, 2001. Based on EPA's comments and our teleconference discussions, we are revising the Excess Stormwater Management Work Plan for submittal on July 27, 2001.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period and includes a schedule of actions to be performed.

- We will be revising the Excess Stormwater Management Work Plan per EPA's Draft comments and teleconference discussions and will resubmit the plan on July 27, 2001.
- Baxter has contracted with Clark M. Leeman Land Surveying to develop a new topographic survey map of the Arlington facility to NAVD-1988 elevation datum to the centerline of the railroad tracks on the east property boundary, and including all man-made features, buildings, ditches, culverts, berms, catch basins and former catch basins, wells, fences, and marked utilities. We expect that the mapping will take a month or two to complete and will be submitted to EPA upon completion.

ANTICIPATED PROBLEMS AND PROBLEM RESOLUTION

This section discusses anticipated problems and planned resolution of past or anticipated problems.

There are no past or anticipated problems at this time.



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OTHER INFORMATION

Any other information relevant to the Order is discussed in this section, including results of any sampling or testing completed within the reporting period.

Lysimeter sampling and analysis were conducted in May 2001 under the State Waste Discharge Permit. These data are summarized and enclosed as a Memorandum Re: May 24, 2001 Lysimeter Sampling Data, to this progress letter. The results indicate:

- The three water samples were non-detect for PCP. L-1 indicated an estimated detection of diesel-range organics at 0.39 mg/L below the MTCA groundwater cleanup level of 0.5 mg/L; and
- Dioxins were non-detect in L-1, and estimated at 1.9 J and 0.079 J pg/L in L-2 and L-3, respectively.

During the week of July 9, 2001, the next round of quarterly groundwater sampling in monitoring wells BXS-1, MW-2, and MW-5, MW-6, and MW-7 was conducted per the requirements of the State Waste Discharge permit.

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. Please let us know if you have any questions or comments on the work conducted to date or contents of this progress report.

Sincerely,

HART CROWSER, INC.

A handwritten signature in blue ink that reads "Lori Herman".

LORI HERMAN

Principal Hydrogeologist

Enclosures: Memorandum Re: May 24, 2001 Lysimeter Sampling Data
 Memorandum Re: Drinking Water Well Inventory and Initial Sampling

cc: Georgia Baxter, J. H. Baxter
 Sara Beth Watson, Steptoe and Johnson

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